



# City of Seattle

Gregory J. Nickels, Mayor

## Seattle Public Utilities

Ray Hoffman, Acting Director

October 2, 2009

Peter DeVries, Council Chair  
State Building Code Council  
PO Box 42525  
Olympia WA 98504-2525

Sent via: e-mail to: [sbcc@commerce.wa.gov](mailto:sbcc@commerce.wa.gov)

RE: Comments on Amendment of WAC 51-56 and 51-57: Adoption and amendment of the 2009 Edition of the Uniform Plumbing Code (UPC) and standards

Dear Mr. DeVries:

We appreciate the opportunity to comment on 402.3.1.3.1 and related 402.3.1.3 regarding non-water urinals.

In the way of background, Seattle Public Utilities administers the largest regional water conservation program in the State of Washington, and has been active in the development of codes and standards at the local, state, and national levels. We continue to advocate for higher levels of water efficiency when products are cost-effective for the user and perform as well as or better than less efficient products without compromising health or safety.

Manufacturers are moving rapidly to introduce high efficiency plumbing products to the marketplace. This is particularly true for toilets and urinals. Urinals are being marketed that use far less water than the 1.0 gpf maximum currently required by 402.3.1.3. Studies are documenting excellent urinal performance at one-half gallon per flush. Several buildings in Seattle have installed urinals that use only one pint per flush with surprising good results. Non-water urinals, sometimes called no-flush urinals, are also appearing. As with all plumbing products, some urinals work better than others, have different costs, and may require greater maintenance. Some consumers have experienced problems with some models of non-water urinals, and have removed and replaced them with flushing urinals. To be fair, consumers have also experienced problems with many plumbing products other than just non-water urinals. Sometimes they have elected to replace them. As with all new products, it takes time for the marketplace to sort out top performers.

We respect the right of consumers to make their own efficient product choices as long as public health and safety are not a concern. In 402.3.1.3.1 it is proposed "Where non-water urinals are installed, they shall have a water distribution line rough-in to the urinal location..." We believe this should not be a required element of the code. It does nothing to protect the public health or safety. Adding this requirement increases the overall cost of non-water urinal installation, without adding a demonstrated direct benefit. Many non-water urinals have been installed and perform well. Those that have not performed well are almost always associated with maintenance issues and/or high maintenance costs.

Consumers should make their own decisions about the maintenance costs of the products they choose. They should weigh the added cost of rough-in during construction against the possible cost to install a water line later, should they choose to replace a non-water urinal with a flushing model. Making economic decisions for consumers should not be a code function. As a result, we support the testimony of Seattle-King County Health, asking that the rough-in requirement be removed from 402.3.1.3.1.

Looking toward the future, the removal and transport of human waste won't always require the use of potable water. Water of lesser quality, such as rainwater, treated wastewater, or no water, may become more common. The Code should maintain flexibility to meet these changes and adapt to new technologies, without locking into the ways things always have been done in the past. A good example of this is urinals, where it is becoming clear that an entire gallon of drinking water every flush is no longer needed to transport urine from the restroom. Consideration should be given to lowering the maximum water use per flush for urinals below the 1.0 gallons specified in 402.3.1.3. The benefits go far beyond the direct consumer, since water efficiency provides more water to meet the water demands of many other users in the state, including fish and wildlife and other environmental needs.

We appreciate the opportunity to provide comments. Please contact me if you have questions regarding these comments at (206) 684-5881.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Al Dietemann', with a long horizontal flourish extending to the right.

Al Dietemann  
Water Conservation Team Lead